

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

TIMOTHY REAVES,)
)
 Plaintiff,)
)
 v.) CIVIL ACTION
) NO. 15-40100
DEPARTMENT OF CORRECTION, ET AL.,)
)
 Defendants.)

**PLAINTIFF'S MOTION FOR *EX PARTE* HEARING
RELATED TO FEASIBILITY OF AVAILABLE RELIEF**

Plaintiff respectfully requests that this Court schedule an *ex parte* hearing with Plaintiff's counsel on Monday, July 27, 2020 at 9:00 a.m. in order to present the Court with information about Plaintiff's privileged and confidential communications with counsel. Counsel requests to convey these confidential communications about potential barriers to finalizing the medical parole plan in order to effect the relief ordered by this Court on August 1, 2019.

FOR THE ABOVE REASONS, Plaintiff respectfully request that this Court ALLOW this motion.

Respectfully submitted,

Plaintiff Timothy Reaves,
By his attorneys,

/s/ Lauren Petit
Lauren Petit, BBO #640410
lpetit@plsm.org
Prisoners' Legal Services of Massachusetts

50 Federal Street, 4th Floor
Boston, MA 02110
(617) 502-6817

Date: July 24, 2020

CERTIFICATE OF CONFERENCE

I hereby certify that I have conferred with counsel for Defendants about this motion and proposed text for a written communication between the Court and Plaintiff. Defense counsel is aware of the proposal and was unable to obtain authorization from his client prior to the filing deadline.

/s/ Lauren Petit

Lauren Petit

CERTIFICATE OF SERVICE

I hereby certify that this document(s) filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants.

/s/ Lauren Petit

Lauren Petit